10/26/92

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the matter of: WALKER PROPERTIES SITE, A 21.32 ACRE PARCEL LOCATED AT THE SOUTHEAST CORNER OF BLOOMFIELD AVENUE AND LAKELAND ROAD IN THE CITY OF SANTA FE SPRINGS, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA Responsible Parties: MR. & MRS. GEORGE WALKER POST OFFICE BOX 466 NORWALK, CALIFORNIA 90650 TEXACO, INC. 10 UNIVERSAL CITY PLAZA UNIVERSAL CITY, CALIFORNIA 91608 FOUR STAR OIL AND GAS COMPANY 10 UNIVERSAL CITY PLAZA UNIVERSAL CITY, CALIFORNIA 91608 LAKEWOOD OIL SERVICE, INC. 13579 WHITTRAM AVENUE FONTANA, CALIFORNIA 92335	Docket No. I&/SE 91/92-009 FIRST AMENDED IMMINENT OR SUBSTANTIAL ENDANGERMENT ORDER AND REMEDIAL ACTION ORDER Health and Safety Code Sections 25355.5(a)(1)(B) and 25358.3(a)

1.0 INTRODUCTION

1.1. Parties. The State of California Environmental Protection Agency Department of Toxic Substances Control (Department) issues this First Amended Imminent or Substantial Endangerment Order (Order) to:

(a) Mr. George Walker, an individual, and Mrs. Mary Beth Walker, an individual (collectively Walker);

(b) Texaco, Inc. and Four Star Oil and Gas Company, (collectively Texaco) Delaware Corporation, doing business in California, successors in interest to Oil Company (Getty) a

Delaware Corporation doing business in California.

(c) Lakewood Oil Service, Inc. (Lakewood), a California Corporation.

1.1.2. Walker, Texaco and Lakewood have been identified by the Department as Responsible Parties.

1.2. Site. The Site which is the subject of this Order is the 21.32 acres located at the southeast corner of Bloomfield Avenue and Lakeland Road in the City of Santa Fe Springs, County of Los Angeles, State of California. The Site is bounded by Lakeland Road on the north, an Atchison, Topeka, and Santa Fe Railroad right-of-way on the east, the southern line of the northern half of the northwestern quarter of section eight, township three south, range 11 west, San Bernardino meridian on the south, and Bloomfield Avenue on the west. The exact boundaries of land impacted by past activities at the Site are unknown at this time, but are believed to be contained within the described area. A map of the general area is attached as Exhibit 1.

1.3. Jurisdiction. The Department has jurisdiction and authority under Health and Safety Code Sections 25358.3(a) and 25355.5(a)(1)(B).

1.3.1. Section 25358.3(a) of the Health and Safety Code authorizes the Department to issue an Order when the Department determines that there may be an imminent or substantial endangerment to the public health or welfare or to the environment, because of a release or a threatened release of a hazardous substance.

1.3.2. Section 25355.(a)(1)(B) of the Health and Safety Code authorizes the Department to issue an Order establishing a schedule for removing or remedying a release of a hazardous substance at a site, or for correcting the conditions that threaten the release of a hazardous substance. The Order includes, but is not limited to, requiring specific dates by which the nature and extent of a release shall be determined and the Site adequately characterized, a Remedial Action Plan prepared and submitted to the Department for approval, and a removal or remedial action completed.

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2.0 FINDINGS OF FACT

2.1. Ownership of Property/Leasing of Property

2.1.1. On May 26, 1934, Getty purchased the entire Site. The successors to Getty are named herein as Responsible Parties. Reportedly, Getty conducted storage of hydrocarbon products and deposition of drilling mud into sumps placed on the Site. The storage of hydrocarbon products at the Site may have led to the accidental and/or chronic leaks or spills resulting in contamination of the soil. Investigations at similar types of facilities have shown that the potential for soil contamination at these facilities is high.

2.1.2. On November 1, 1968, Getty began leasing the northwest portion of the Site to Lakewood. Lakewood is named herein as a Responsible Party. Lakewood operated within the area designated as the "Lakewood Section" in paragraph 2.2.1.1. of this Order. The street address for Lakewood was 11020 South Bloomfield Avenue. Lakewood continuously leased the northwest portion from 1965 to 1984, at which time it declared bankruptcy. Bankruptcy proceedings were concluded on August 22, 1985.

2.1.3. On June 14, 1979, Walker purchased the entire Site from Getty. Walker is named herein as a Responsible Party. Walker continues to own the Site to the present date. Lakewood continued to lease and operate within the area described in paragraph 2.2.1.1. of this Order without interruption.

2.1.4. In the mid-1980's, Texaco Oil Company, currently known as Texaco, Inc., acquired all rights, title and interest in Getty, and has thereby assumed liability as a Responsible Party.

Texaco, Inc. has repeatedly represented the interests of Getty before the Department. On or about October 23, 1989, Getty filed a notice changing its name to Four Star Oil and Gas Company.

2.2. Physical Description of Site. The Site is a 21.32 acre parcel located in a mixed residential and industrial portion of the City of Santa Fe Springs. Prior to 1967, a drainage area was located on the eastern portion of the Site. The drainage area dropped from 140 feet above sea level at the northern property boundary to 130 feet above sea level. The Site generally slopes to the southwest in a direction towards the San Gabriel River. The Site lies within a Zone B (100 year) as well as a Zone C (intermittent localized) flood plain.

2.2.1. The Site has been subdivided into parcels for the purpose of investigation and proposed development. The investigations have not been complete, however, the information available at this time indicates that the areas primarily impacted by the substances enumerated in paragraph 2.1. of this Order are within two areas.

2.2.1.1. The first area will be designated the "Lakewood Section". This section is the area enclosed when one starts at the northwestern corner of the property, and proceeds 350 feet to the east, then proceeds 870 feet to the south, 350 feet to the west, and 870 feet to the north, to the point of beginning. This area is shown on Exhibit 2. This area has been impacted by the operations of Lakewood. There are a small number of drums placed on this area.

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2.2.1.2. The second area will be designated the "Railroad Section". This section is the area enclosed when one begins at the northeastern corner and proceeds 175 feet to the west, then south to the southern property boundary, 175 feet to the east along the property boundary to the southeastern corner, and then along the eastern boundary to the point of beginning. This area is primarily impacted by asbestos containing insulation and more than 100 drums are placed in this area. This area is shown on Exhibit 2.

2.2.1.3. The remainder of the Site may have been impacted by either of these areas, however, the Department has no substantiation of these impacts. The Department is conducting further investigation of past activities in this remaining area. The Department may add characterization and remediation requirements, for all or part of the remaining area, to this Order at a later date. The Department will require such investigations in the event that it is shown that either the asbestos from the Railroad Section, the operations of Lakewood, or other industrial activities caused the deposition of hazardous substances into the soil in these areas.

2.2.2. The State Regional Water Quality Control Board (Board) is the lead agency for the closure of the above-ground storage tanks located in the southwestern corner of the Site.

2.2.3. The fencing surrounding the Site was degraded and had deteriorated to a point where it did not effectively prevent the general public from entering the Site, as defined in paragraph 1.2, prior to the issuance of the original Imminent or Substantial

Endangerment Order and Remedial Action Order, Docket No. I & SE 91/92-009. During the period of non-compliance by the Responsible Parties, the Department fenced the entire site except the portion in the southwestern corner being leased to the Balboa Pacific Corporation by the Walkers. Appropriate notification signs were also posted to warn the general public of the hazardous conditions within the fenced area.

2.2.4. The Site was overgrown with weeds. Due to the current drought these weeds were dried out. The dry weeds created a fire hazard at the Site. To prevent possible fires and airborne dispersal of hazardous substances, the weeds must be controlled on all portions of the Site. During the period of non-compliance the Department constructed fire breaks around the drum storage area and the berms containing the three remaining aboveground tanks. Following this action by the Department, Texaco, initiated the removal of the weeds from the balance of the Site, as an act of good faith to demonstrate their willingness to come back into compliance. The weed removal by Texaco began on September 24, 1992 and was completed on or about October 5, 1992. The Department has not received any documentation showing that this action satisfies the requirements for weed control set forth in paragraph 4.3 of this Order.

2.2.5. There are approximately one hundred (100) drums containing unknown, suspected hazardous, substances located at the Site. These drums are deteriorating due to exposure to the natural elements. These drums create a spill hazard as well as potential explosion hazard in the event of a fire. During the

period of non-compliance, the Department, initiated the stabilization of the drums in order to inhibit the further deterioration of the drums. These drums and their contents still need to be transported to an appropriate facility.

2.3. Site History. The Site is currently owned by Walker. The Site was previously owned by Getty from 1934 to 1979. The Site was used by Getty from approximately 1934 until 1964 for hydrocarbon storage, equipment storage, and oil well drilling fluids storage and disposal. From 1965 to 1979 Lakewood leased a portion of the Site (the majority of the "Lakewood Section") from Getty. Getty leased the southwestern corner of the Site to Powerine Oil Company (Powerine) from the 1968 to 1979. Powerine utilized two (2) above ground storage tanks on the property, these tanks were constructed prior to 1945 (see paragraph 2.3.2. of this Order). These tanks are subject to regulation by the Board. Walker has owned the Site since 1979. Concurrent with the purchase of the property by Walker, Getty assigned the Powerine and Lakewood leases to Walker. Since the early 1980's various private consulting firms have conducted sampling at the Site, at the request of Walker or his agents. The information gathered to date indicates that the area designated as the Lakewood section has been impacted by contaminants associated with used oil and lubricating fluids; structures along the railroad spur were constructed with asbestos-containing materials; and the area near the Powerine tanks has been impacted by hydrocarbon contamination associated with fuel storage. Remediation or abatement of the soil impacted by spills or leaks from the Powerine tanks are

regulated by the Board. Areas of the Site that have been impacted are described in the document entitled "Preliminary Endangerment Assessment Report Walker Properties" dated July 12, 1990 with response to comments dated October 25, 1990. The Department has reviewed and concurred with the findings of this document.

2.3.1. From 1968 to 1984 Lakewood engaged in the recycling of used motor oil on the Lakewood portion of the Site. Lakewood constructed office structures, unloading facilities, and numerous tanks. During this time Lakewood, with Getty's permission, built three (3) above-ground storage tanks on the Lakewood Section. These tanks were constructed in the area that has incurred the greatest extent of impact from the used oil, polychlorinated biphenyls (PCBs), metals and lubricating fluids which were deposited on or into the soil.

2.3.2. The Site is known to have been the location of above-ground storage tanks, underground storage tanks, and settling ponds. These types of facilities have been found at other hazardous waste sites in the state. In the 1920's three (3) large above-ground storage tanks and associated foundations and four (4) earthen sumps were constructed at the Site. Two (2) of these tanks were removed prior to 1945, following removal, the soil near the tank foundation was stained, indicating that the contamination of the soil had occurred due to the release of the contents of the former tank. A large pond area is evident at the Site prior to 1945. During the 1940's two (2) large above-ground storage tanks and an earthen berm were constructed in the southwestern corner of the Site and twenty-three (23) small above-

ground storage tanks have been placed near the remaining above-ground storage tank which was installed in the 1920's. Also during the 1940's three (3) of the four (4) earthen sumps have been removed, the remaining sump has been enlarged and a new sump has been added. During the 1950's the remaining large above-ground storage tank, which was installed in the 1920's, was removed; seven (7) of the twenty-three (23) small above-ground storage tanks, installed in the 1940's, have been removed; and the large pond area, noted prior to 1945, has been reduced in size. Eight (8) of the twenty-three (23) tanks were removed prior to 1962 and the large pond area, noted prior to 1945, has been filled in by 1962. Prior to 1974 the remaining sump has been filled in and six (6) new above-ground storage tanks have been placed in the northwestern corner of the Site. Prior to 1981 two (2) more above-ground storage tanks have been placed in the northwestern corner. An above-ground storage tank has also been placed in the central portion of the Site.

2.3.3. The Department is in possession of reports which contain the results of soil sampling conducted at the Site. This sampling indicates that the soil in the Lakewood section of the Site contains substances which are associated with the recycling of used motor oil and lubricating fluids.

2.3.4. From the time Lakewood began operation at the site until the time Lakewood filed for bankruptcy, Lakewood transported used motor oil and lubricating fluids to the Site for storage or treatment. Some of the treatment processes resulted in residues, from used motor oil and lubricating fluids, being deposited in the

soil at the Site. Storage of liquids resulted in on going spills and leaks which resulted in residues, from used motor oil and lubricating fluids, being deposited on or into in the soil at the Site.

2.3.5. On or about March 31, 1992, the Department issued the original Imminent or Substantial Endangerment Order and Remedial Action Order, Docket No. I&SE 91/92-009 to the Responsible Parties. On or about June 17, 1992, the Department found the Responsible Parties to be in non-compliance with said Order.

2.3.6. On or about June 27, 1992, the Department expended funds to stabilize the drums, fence and post the Site, and construct fire breaks around the drum storage area and the PCB contaminated area. Portions of the fence were repaired or replaced and warning signs were posted. Drums in deteriorated condition were repackaged into overpack drums. Fire breaks were constructed around the three remaining above-ground storage tanks and the drum storage area.

2.4. Substances Found at the Site. PCBs, lead, barium, copper, and asbestos have been detected in soils at the Site.

2.4.1. PCBs are listed as an Organic Persistent and Bioaccumulative Toxic Substance in Title 22, California Code of Regulations, Section 66261.24. This is due to the fact that PCBs do not break down into simpler, less harmful compounds in the environment. PCBs tend to accumulate in animal tissues.

2.4.1.1. Acute, chronic exposure to PCBs have been linked to an increase in liver damage.

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2.4.1.2. The maximum concentration of PCBs in soil samples collected at the Site is 248 parts per million.

2.4.1.3. The Total Threshold Limit Concentration (TTLC) for PCBs in soil is 50 milligrams per kilogram (approximately equal to 50 parts per million).

2.4.1.4. PCBs are listed as a Chemical Known to the State to Cause Cancer pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986, Health and Safety Code section 25249.5 et seq.

2.4.1.5. PCBs were commonly mixed with oils due to their dielectric qualities.

2.4.1.6. PCBs have impacted an estimated 5,000 cubic yards of soil at the Site. These soils are located within the Lakewood Section. The impacted soils are in the area of the three (3) remaining above-ground storage tanks.

2.4.2. Lead is listed as an Inorganic Persistent and Bioaccumulative Toxic Substance in Title 22, Section 66699(b) of the California Code of Regulations, section 66261.24.

2.4.2.1. The maximum concentration of lead in soil samples collected at the Site is 2,470 milligrams per kilogram.

2.4.2.2. The TTLC for lead in soil is 1,000 milligrams per kilogram.

2.4.2.3. Lead is listed as a "Chemical Known to the State, to Cause Cancer and to Cause Developmental, Female and Male Reproductive Toxicity" pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986, Health and Safety Code section 25249.5 et seq.

2.4.2.4. Wastes Containing organic lead compounds at a TTLC greater than 1,300 milligrams per kilogram is an extremely hazardous waste pursuant to Title 22, California Code of Regulations, Section 66261.113.

2.4.2.5. Lead is commonly found in refined products, as an anti-knock additive, and in used oils, as a result of use.

2.4.2.6. Lead has been found in the soils located in the Lakewood Section. The impacted soils are in the area of the three (3) remaining above-ground storage tanks.

2.4.3. Copper is listed as an Inorganic Persistent and Bioaccumulative Toxic Substance in Title 22, California Code of Regulations, section 66261.24.

2.4.3.1. The maximum concentration of copper in soil samples collected at the Site is 5,140 milligrams per kilogram.

2.4.3.2. The TTLC for copper in soil is 2,500 milligrams per kilogram.

2.4.3.3. Copper has been found in the soils located in the Lakewood Section. The impacted soils are in the area of the three (3) remaining above-ground storage tanks.

2.4.4. Asbestos is listed as an Inorganic Persistent and Bioaccumulative Toxic Substance in Title 22, California Code of Regulations, Section 66261.24.

2.4.4.1. Asbestos was found in approximately 200 square feet of building insulation. The asbestos insulation is located in the Railroad Section of the Site.

2.4.4.2. Asbestos fibers have been found to cause asbestosis, a severe lung ailment, certain types of lung cancer,

and other respiratory problems.

2.4.4.3. Asbestos-containing building materials can only release fibers when the material is removed during demolition or altered due to remodeling, or deterioration. The asbestos insulation in the Railroad Section is exposed to the elements. This exposure will eventually lead to deterioration and a release of asbestos fibers.

2.4.7.4. Asbestos is listed as a Chemical Known to the State to Cause Cancer pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986, Health and Safety Code Section 25249.5 et seq.

2.5. Health Effects. Many of the substances found at the Site are carcinogenic or toxic.

2.5.1. PCBs are known carcinogens, can cause birth defects, chloracne and liver damage.

2.5.1.1. Prior to the issuance of the original Imminent of Substantial Endangerment Order and Remedial Action Order, Docket No. I&SE 91/92-009, the Site was uncontrolled due to a lack of fencing and access restriction. Unless the present fencing is maintained, persons entering the site could come into direct dermal contact with PCBs.

2.5.1.2. The potential for a weed and brush fire still exists and will increase in the event that weed growth is not controlled due to the dry conditions in the region. In the event of a fire it is possible that PCBs will become entrained in the ash and soot. Firefighters, employees at adjacent companies, and off-site residents could inhale these contaminated air streams.

Some of the PCBs will be effectively incinerated during the fire and could be transformed into dioxins and furans, which are also hazardous substances.

2.5.1.3. Transient persons could seek shelter in the remaining above ground storage tanks, by entering through the cleaning ports, which are open, and become exposed through soil contact. In the event these persons build cooking fires an exposure to PCB-contaminated smoke is likely. The fire could also transform the PCBs into dioxins and furans.

2.5.2. Lead poisoning is one of the most commonly reported occupational diseases. Some lead compounds are carcinogens of the lungs and kidneys. Exposure pathways include both ingestion and inhalation. Upon inhalation, absorption takes place through the respiratory tract and symptoms tend to develop more quickly than from ingestion. Lead is a bioaccumulative substance. Increasing amounts build up in the body to a point where symptoms and disabilities occur. Lead is a developmental, female, and male reproductive toxin. Lead is a known carcinogen.

2.5.2.1. Persons entering the Site could inhale lead entrained in dusts generated through windy conditions or by walking, or in the fumes from a weed and brush fire.

2.5.3. Copper compounds are potentially toxic. Copper is a bioaccumulative substance.

2.5.3.1. Persons entering the Site could inhale copper entrained in dusts generated through windy conditions or by walking, or in the fumes from a weed and brush fire.

2.5.4. Asbestos is a human carcinogen.

2.5.4.1. Children entering the Site may, through mischievous acts, demolish some of the structures in the Railroad Section and bring about the release of asbestos fibers from the insulation.

2.5.4.2. Homeless persons may also try to demolish these structures to build temporary homes. A transient who builds such a "cardboard box home" with asbestos-containing material would effectively expose him or herself to asbestos on an ongoing, or chronic, basis.

2.6. Routes of Exposure.

2.6.1. Subsequent to the determination of non-compliance with the original Imminent or Substantial Endangerment Order and Remedial Action Order, Docket No. I&SE 91/92-009, the Department constructed fencing to restrict Site access. Without such restricted access, children in the area could wander onto the Site and be exposed to chemicals through dermal contact or soil ingestion. Children generally ingest more soil than adults due to mouthing behavior and activity, that is, children put their hands in their mouth more often, and play in the dirt more often than adults. Continued maintenance of the fencing is necessary to maintain the effectiveness of this access restriction.

2.6.2. Without restricted access to the Site, there is a mechanism for direct contact. Children and transients can enter the Site and directly ingest, or come into dermal contact with, the contaminated soils.

2.6.3. Children entering the Site may, through mischievous acts, demolish some of the structures in the Railroad Section and bring about the release of asbestos fibers from the insulation.

2.6.4. Homeless persons may also try to demolish or reconfigure these structures to build temporary homes. A transient who builds such a "cardboard box home" with asbestos containing material would effectively expose him or herself to asbestos on an ongoing, or chronic, basis.

2.6.5. Homeless persons may also take shelter in the remaining above ground storage tanks located in the Lakewood Section and bring about an ongoing exposure of themselves to PCBs. These contaminants would be transmitted through dermal contact and ingestion. Homeless persons often build fires nightly, such a practice would cause the ongoing incineration of PCB's and the possible generation of dioxins and furans.

2.6.6. The overgrown weeds at the Site present a fire threat. A brush or weed fire could provide a transport mechanism for the off-site migration of fumes contaminated with PCBs, lead, copper and potentially dioxins and furans.

2.6.7. Waste may become entrained in dusts and migrate off-site during windy periods. Dusts or fibers could then be inhaled by residents or workers in the surrounding area.

2.7. Population at Risk. There are approximately 500 residents and workers within 4 miles of the Site.

2.7.1. The nearest residential areas are located one-half mile east and one-half mile west of the Site.

2.7.2. The nearest school is within three-eights of a mile. There are six schools within one mile of the Site.

2.7.3. The Metropolitan State Hospital is within 250 feet of the Site.

3.0 CONCLUSIONS OF LAW

3.1. Responsible Parties. The Responsible Parties listed in paragraph 1.1.4. are each a "Responsible Party" or "Liable Person" as defined by Health and Safety Code Sections 25319, 25323.5 and 25385.1(g).

3.1.1. Walker, Lakewood, and Texaco are a "Person" as defined by Section 25319 of the Health and Safety Code; and

3.1.2. Walker, Lakewood, and Texaco are a "Responsible Party" as defined by Section 25385.1(g) of the Health and Safety Code; or

3.1.3. Walker, Lakewood, and Texaco are a "Responsible Party" or "Liable Person" as defined by Section 25323.5 of the Health and Safety Code.

3.2. Hazardous Substances. Each of the substances listed in paragraph 2.4. is a "hazardous substance," as defined by Health and Safety Code Section 25316, and has been found at the Site.

3.3. Release. A "release" or threatened release of the hazardous substances listed in paragraph 2.4. has occurred at or from the Site, as defined by Health and Safety Code Section 25320.

3.4. Threat. The actual and/or threatened release of hazardous substances at the Site may present an imminent or substantial endangerment to the public health or welfare or to the environment.

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4.0 ORDER

4.1. Actions Necessary. Based on the foregoing findings of fact and conclusions of law, the Department orders the Responsible Parties named above to take the following actions:

4.2. Fence and Post. The Responsible Parties shall maintain and repair, as necessary, the fence erected by the Department until the Department determines that this measure is no longer necessary.

4.2.1. The fence shall be at least six (6) feet high.

4.2.2. Signs will be maintained on the fenced areas which read: "Caution: Hazardous Substance Area Unauthorized Persons Keep Out for more information contact: State of California Environmental Protection Agency Department of Toxic Substances Control 1405 N. San Fernando Boulevard Burbank, California 91504 (818) 567-3078".

4.2.4. A sign shall be maintained on each line of the fence at intervals no greater than one hundred (100) feet.

4.2.5. The signs shall have lettering which is legible from twenty-five (25) feet.

4.2.6. Signs shall be maintained within ten (10) feet of all entry gates into the fenced areas.

4.2.7. The condition of the fence shall be inspected monthly. A report of this inspection shall be included in the Monthly Activity Reports required by paragraph 4.10.1.

4.3. Weed Control and Abatement. The Responsible Parties shall maintain the control and periodic removal of all weeds and brush on the Site.

4.3.1. Weed removal shall be sufficient to bring and maintain the Site within the requirements of the fire code.

4.3.2. The Responsible Parties must obtain verification of completion of these weed abatement from the local fire department within forty-five (45) days of the effective date of this order.

4.4. Drum Removal. Within sixty (60) days of the effective date of this order the Responsible Parties shall submit to the Department a detailed Drum Removal Plan for the removal, transport, and appropriate disposition of all of the drums which are now located at the Site.

4.4.1. The Drum Removal Plan shall include chemical profiles of the contents of the drums.

4.4.2. The Drum Removal Plan shall describe the rationale and methods for determining the chemical profiles.

4.4.3. The Drum Removal Plan shall designate appropriately trained personnel for the staging, handling and loading of appropriate containers or trailers for the transport of these drums to an appropriate treatment, storage, or disposal facility.

4.4.4. The Drum Removal Plan shall designate appropriately trained, licensed, and registered transporters for the transport of these drums to an appropriate treatment, storage, or disposal facility.

4.4.5. The Drum Removal Plan shall include route maps from the Site to an appropriate treatment, storage, or disposal facility.

4.4.6. The Drum Removal Plan shall identify and provide communication and notification mechanisms for local emergency

response organizations with jurisdiction along routes of travel who will be notified prior to the shipment of these drums through their area.

4.4.7. The Drum Removal Plan shall contain:

(a) A brief Site history including the regulatory problems, use, and ownership of the Site;

(b) A description of the scope of work including a discussion of the relative hazard of the material being hauled, the frequency of trips, estimated quantity of material being removed, population density and traffic congestion along the proposed route;

(c) A description of the drum removal;

(d) A description of the characteristics of the waste to be transported;

(e) The destination of the waste including a discussion of the rationale behind selection of this treatment, storage, or disposal facility and the regulatory status of this facility;

(f) A discussion of the transportation mode including the types of vehicles to be used loading and unloading methods, placarding requirements, and capacity of each vehicle;

(g) A map of the route from the Site to the facility, or facilities, chosen and a discussion of the rationale for choosing the route.

(h) A list of the emergency response and law enforcement agencies with jurisdiction along the route;

(i) a description of the procedures for manifesting, logging trips, identifying the transporter, destination, time of departure and arrival, and quantity of material transported; and

(j) A contingency plan that outlines the basic procedures to be followed in the event of an accident involving the transport vehicle.

4.4.8. The Drum Removal Plan shall include a schedule which will enable the Responsible Parties to complete the drum removal and submit a Drum Removal/Disposal Report within one hundred and eighty (180) days of the effective date of this Order.

4.5. REMEDIAL INVESTIGATION AND FEASIBILITY STUDY. The Responsible Parties shall undertake all activities necessary to complete a Remedial Investigation and Feasibility Study that meets the objectives specified in paragraph 4.5.2.

4.5.1. Remedial Investigation/Feasibility Study Workplan Submission. Within one hundred and twenty (120) days of the effective date of this Order, the Responsible Parties shall prepare and submit to the Department, for review and approval, a detailed Remedial Investigation/Feasibility Study Workplan and implementation schedule which covers all the activities necessary to conduct a complete a Remedial Investigation and Feasibility Study of the Site and any off-site areas where there is a release or threatened release of hazardous substances from the Site. The Remedial Investigation/Feasibility Study Workplan and activities under it shall, at a minimum, be based on the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. 9601 et seq.), as amended, the National Contingency Plan (40 CFR Part 300), as amended, and the U.S. Environmental Protection Agency's (EPA's) "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA," dated

October 1988, as well as state laws and regulations, as amended. The Remedial Investigation/Feasibility Study Workplan shall be designed to meet the objectives of paragraph 4.5.2. and shall, at a minimum, cover all of the elements described in paragraphs 4.5.3 through 4.5.5.

4.5.2. Remedial Investigation/Feasibility Study Objectives. The objectives of the Remedial Investigation/Feasibility Study are to:

(a) Determine the nature and full extent of hazardous substance contamination of air, soil, surface water and ground water at the Site and contamination from the Site, including off-site areas affected by the Site;

(b) Identify all existing and potential migration pathways, including the direction, rate and dispersion of contaminant migration:

(c) Determine the magnitude and probability of actual or potential harm the public health, safety or welfare or to the environment posed by the threatened or actual release of hazardous substances at or from the Site;

(d) Identify and evaluate appropriate response measures to prevent or minimize future releases and mitigate any releases which have already occurred; and

(e) Collect and evaluate the information necessary to prepare a Remedial Action Plan in accordance with the requirements of Health and Safety Code Section 25356.1.

4.5.3. Remedial Investigation/Feasibility Study Workplan Contents. The Remedial Investigation/Feasibility Study Workplan

shall be designed to meet the objectives in paragraph 4.5.2 of the Order and shall cover, at a minimum, each of the following elements:

(a) Project Management Plan. A Project Management Plan which describes how the project will be managed by the Responsible Parties and its contractors, subcontractors and consultants including an organization chart with the names, titles and addresses of key personnel and a description of their individual responsibilities;

(b) Scoping Document. A Scoping Document which consists of an evaluation of existing data and identification of the data needs and investigation tasks for the Remedial Investigation/Feasibility Study including, at a minimum, the following information:

(1) A map and description of known site characteristics, including topography, hydrogeology, buildings and structures and all other characteristics relevant to an evaluation of hazardous substance sources, pathways and receptors and potential impacts on health and the environment;

(2) A description of hazardous substance characteristics including:

(A) A list of all hazardous substances, materials or wastes which were disposed, discharged, spilled, treated, stored, transferred, transported, handled or used at the Site and a description of their estimated volumes, concentrations and characteristics;

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(B) A description of all manufacturing processes which are or were related to each hazardous substance, material or waste or which produced any hazardous waste; and

(C) A description of past disposal practices;

(3) A summary of all existing data including air, soil, surface water, and ground water data that has been previously generated and the Quality Assurance/Quality Control procedures which were followed;

(4) A description of the nature and extent of the release and/or threatened release, including a summary of actual and potential on-site and off-site health and environmental effects;

(5) A description of any previous response actions;

(6) An identification of the general types of response actions which will be evaluated in the Feasibility Study;

(7) An identification of all data gaps;

(8) Recommendations for all additional work needed to eliminate any data gaps.

(c) Sampling Plan. A Sampling Plan which describes the activities which will be undertaken to develop a complete profile of on-site and off-site air, soil, surface water and ground water contamination attributable to operations at the Site including, at a minimum, the following information:

(1) The objectives of the investigation;

(2) Identification of all chemical parameters which will be analyzed or tested;

(3) A description of the types of samples which will be taken;

(4) A map showing all locations which will be sampled;

(5) A description of the depth and frequency of sampling at each location;

(6) The engineering specifications for all sampling installations such as ground water monitoring wells, soil borings and piezometers;

(7) Identification of all analytical procedures to be used; and

(8) Provisions for obtaining access to and obtaining samples from adjacent properties, where appropriate.

(d) Quality Assurance/Quality Control Plan. A Quality Assurance/Quality Control Plan which describes the procedures for the collection, identification, preservation and transport of samples, the calibration and maintenance of instruments, and the processing, verifications, storage and reporting of data, and including chain of custody procedures, identification of qualified person(s) conducting the sampling and of a laboratory certified or approved by the Department of Health Services pursuant to Health and Safety Code Section 25198;

(e) Data Management Plan. A Data Management Plan which describes how the data obtained pursuant to this Order will be managed and preserved by the Responsible Parties in accordance with paragraph 4.17.;

(f) Site Health and Safety Plan. A Site Health and Safety Plan which describes the specific personnel, procedures and equipment and covers all measures including contingency plans which will be taken during field activities to protect the health

and safety of the workers at the Site, authorized representatives of the Department, and the general public from exposure to hazardous wastes, substances or materials.

(g) Public Health and Environmental Evaluation Plan. A Public Health and Environmental Evaluation Plan which describes how the magnitude and probability of actual or potential harm to public health and the environment by the threatened and/or actual release of a hazardous substance(s) will be determined. The Public Health and Environmental Evaluation Plan shall be written in a manner consistent with the EPA's "Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual (Part A)" dated December 1989, "Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual (Part B, Development of Risk-based Preliminary Remediation Goals)" dated October 1991, and "Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual (Part C, Risk Evaluation of Remedial Alternatives)" dated October 1991. The Public Health and Environmental Evaluation Plan shall describe the activities necessary to accomplish this task including:

(1) An evaluation of the results of previous investigations showing the actual and potential amounts and concentrations of hazardous substances in all relevant environmental medial (air, water, soil, sediment and biota);

(2) An evaluation of the data necessary to obtain a representative model of the actual and potential amounts and concentrations of hazardous substances in all relevant media (air, water, soil, sediment, and biota) at the conclusion of the

Remedial Investigation and projected in the future;

(3) An assessment of the environmental fate and transport mechanisms for each hazardous substance within the relevant environmental media;

(4) An identification of the toxicological properties and relevant human health and environmental standards and criteria of the hazardous substance(s) found during the Remedial Investigation;

(5) An identification of all applicable or relevant and appropriate requirements for the hazardous substances found during the Remedial Investigation;

(6) An identification of all exposure pathways and the extent of actual and/or potential exposure;

(7) Identification of the population(s) at risk;

(8) An evaluation of the extent of expected harm and the likelihood of such harm occurring; and

(9) An evaluation of the concentrations of hazardous substances that would pose no threat to public health and the environment.

(h) Feasibility Study Plan. A Feasibility Study Plan which describes how the Feasibility Study will identify, develop and evaluate remedial action alternatives with respect to technical, public health, environmental, institutional, and cost considerations, and including, at a minimum, the following information:

(1) A summary of the existing and potential hazards for which corrective action may be required;

(2) A description of the alternative remedial actions which will be evaluated;

(3) A list of the technologies which will be screened for each alternative remedial action described in (2) above;

(4) A description of the public health, environmental and cost factors and criteria which will be considered in screening and analyzing each alternative remedial action technology, including, but not limited to, effectiveness, reliability, timeliness of implementation, unit cost, availability, operation and maintenance costs and conformity with applicable laws and regulations; and

(5) A description of all pilot studies, bench tests or other activities which will be performed to evaluate each alternative remedial action technology; and

(6) A description of the federal and state environmental and public health requirements to be considered in developing the remedy.

(i) Other Activities. A description of any other significant activities not already addressed in the Remedial Investigation/Feasibility Study Workplan and necessary to perform the Remedial Investigation/Feasibility Study and submit the Remedial Investigation Report and Feasibility Study Report in compliance with paragraphs 4.5.4 and 4.5.5 of this Order;

(j) Schedule. A schedule which provides specific time frames and dates for completion of each activity and report conducted or submitted under the Remedial Investigation/Feasibility Study Workplan. The schedule shall provide that all activities and

documents associated with the Remedial Investigation/Feasibility Study be completed, reviewed and approved by the Department in accordance with the general schedule attached hereto and incorporated herein as Exhibit 3.

4.5.4. Remedial Investigation Report. The Remedial Investigation Report shall be prepared and submitted by the Responsible Parties to the Department for review and approval in accordance with the approved Remedial Investigation/Feasibility Study Workplan Schedule and Exhibit 3. The Remedial Investigation Report shall summarize the results of the Remedial Investigation including reduction, presentation and interpretation of all data and information generated and/or compiled during the Remedial Investigation. The Remedial Investigation Report shall cover the following subjects relating to the site:

a. Introduction
    1. Overview of Report
    2. Site Background Information
    3. Nature and Extent of Problem(s)
    4. Remedial Investigation Summary

b. The Site Features Investigation
    1. Demography
    2. Land Use
    3. Natural Resources
    4. Climatology

c. Hazardous Substance Investigation
    1. Waste Types
    2. Waste Component Characteristics and Behavior

d. Hydrogeologic Investigation

1. Soils

2. Geology

3. Ground Water

e. Surface Water Investigation

1. Surface Water

2. Sediments

3. Flood Potential

4. Drainage

f. Air Investigation

g. Biota Investigation

1. Flora

2. Fauna

h. Public Health and Environmental Evaluation

1. Potential Receptors

2. Public Health Impacts

3. Environmental Impacts

i. Summary and Conclusion

1. Summary of Findings of the Remedial Investigations

2. Conclusion

4.5.5. Feasibility Study Report. The Feasibility Study Report shall be prepared and submitted by the Responsible Parties to the Department for review and approval in accordance with the approved Remedial Investigation/Feasibility Study Workplan Schedule and Exhibit 3. The Feasibility Study Report shall summarize the results of the Feasibility Study including reduction, presentation and interpretation of all data and

information generated and/or compiled during the Feasibility Study. The Feasibility Study Report shall cover the following subjects relating to the Site.

a. Description of Current Situation

1. The Site Background Information

2. Nature and Extent of Release

3. Objective of Remedial Action(s)

b. Description of Remedial Action Technologies

1. Pilot Studies

2. Bench Tests

c. Screening of Remedial Action Technologies

1. Technical Criteria

2. Remedial Action Alternatives Developed

3. Environmental and Public Health Criteria

4. Other Screening Criteria

5. Cost Criteria

d. Analysis of Remedial Action Alternatives

1. Technical Feasibility

2. Environmental Evaluation

3. Institutional Requirements

4. Public Health Evaluation

5. Cost Analysis

e. Recommended Remedial Action.

4.5.6. Remedial Investigation/Feasibility Study Workplan Implementation. The Responsible Parties shall implement the Remedial Investigation/Feasibility Study Workplan as approved by the Department in accordance with the approved schedule and

Exhibit 3.

4.6. Public Participation Plan. The Responsible Parties shall prepare and submit for Department review and approval a Public Participation Plan which describes how the public and the adjoining community will be kept informed of activities conducted at the Site and how responses will be made to inquiries from concerned citizens.

4.6.1. Public Participation Plan Submission. Within one hundred and twenty (120) days of the effective date of this Order, the Responsible Parties shall prepare and submit for Department review and approval a Public Participation Plan. The Public Participation Plan shall be developed in accordance with:

(a) The Department's written guidance entitled "Public Participation and Guidance Manual";

(b) Applicable portions of Sections 25256.1(d) and 25358.7(b) of the Health and Safety Code;

(c) The findings of the Public Participation Interviews conducted as required by paragraph 4.6.2..

4.6.2. Public Participation Interviews. The Responsible Party shall conduct Public Participation interviews in accordance with 40 Code of Federal Regulations Section 300.430(c). The list of interviewees as well as a list of interview questions shall be approved by the Department in advance of the interviews. The list of interviewees and interview questions shall be submitted, for review and approval within sixty (60) days of the effective date of this Order.

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4.6.3. Fact Sheet Number 1. The first draft of Fact Sheet Number 1, for the Site (the Remedial Investigation/Feasibility Study Fact Sheet), shall be included in the Public Participation Plan submitted in accordance with paragraph 4.6.1. The Fact Sheet shall be revised in accordance with the schedule provided with the Department's comments on the first draft, or its subsequent revisions, as specified in paragraph 4.11.

4.7. Remedial Action Plan. The Responsible Parties shall prepare a Remedial Action Plan shall be prepared in accordance with the standards and requirements set forth in Health and Safety Code Section 25356.1.

4.7.1. Draft Remedial Action Plan. Within sixty (60) days after Department approval of the Feasibility Study Report, the Responsible Parties shall prepare and submit to the Department for review and approval a draft Remedial Action Plan which is based on the approved Remedial Investigation and Feasibility Study Reports. The draft Remedial Action Plan shall set forth in detail the steps to remedy air, soil, surface water and ground water contamination at the Site and adjacent areas. The draft Remedial Action Plan shall be prepared in accordance with the standards and requirements set forth in Health and Safety Code Section 25356.1. In addition the draft Remedial Action Plan shall contain a schedule for implementation of all proposed removal and remedial actions. The Department will review, revise as appropriate, and approve, for release for public review, the draft Remedial Action Plan. Upon release of the draft Remedial Action Plan, the draft Remedial Action Plan shall be made available to the public, for

the public comment period, during this time the Department will receive comments on the draft Remedial Action Plan. The length of the public comment period shall be specified by the Department.

4.7.2. Final Remedial Action Plan. Within thirty (30) days of completion of the public comment period, the draft Remedial Action Plan shall be revised, as appropriate, in response to relevant public comments as determined by the Department. The revisions shall be made by the Responsible Parties. Upon approval of the revised draft Remedial Action Plan by the Department, it shall be considered adopted as the final Remedial Action Plan.

4.8. Remedial Design and Implementation Plan. The Responsible Parties shall submit to the Department for review and approval a detailed Remedial Design and Implementation Plan as specified in the final Remedial Action Plan adopted in accordance with Health and Safety Code Section 25356.1 and paragraph 4.7.2 The Remedial Design and Implementation Plan shall be revised by the Responsible Parties as deemed necessary by the Department.

4.8.1. The Remedial Design and Implementation Plan shall contain engineering designs, technical plans, and operational plans for the implementation of the approved remedial or removal action alternative(s), in accordance with the schedule contained in the final Remedial Action Plan. The Remedial Design and Implementation Plan shall also describe the nature and design of the construction equipment to be employed, a site specific hazardous waste transportation plan (if necessary), the identity of any contractors, transporters and other persons conducting the removal and remedial activities for the Site, post remedial

sampling and monitoring procedures for air, soil, surface water and ground water, operation and maintenance procedures and schedules, and shall cover all of the subjects described in paragraphs 4.5.3 (a), (c), (d), (e) and (f) as they pertain to the removal, remedial, and operation and maintenance activities. The schedule submitted with the Remedial Design and Implementation Plan shall provide that all approved removal or remedial actions excluding operation and maintenance shall be completed by the end of July 1994.

4.8.2. Implementation of Final Remedial Action Plan. Upon Department approval of the Remedial Design and Implementation Plan and schedule the Responsible Parties shall implement the final Remedial Action Plan as adopted in accordance with the approved Remedial Design and Implementation Plan and schedule contained in the final Remedial Action Plan.

4.8.3 Operation and Maintenance. The Responsible Parties shall be responsible for all operation and maintenance requirements in accordance with the final Remedial Action Plan and the approved Remedial Design and Implementation Plan.

4.8.4. Changes During Implementation of the final Remedial Action Plan. During the implementation of the final Remedial Action Plan and Remedial Design and Implementation Plan, the Department may specify such additions, modifications and revisions to the Remedial Design and Implementation Plan as it deems necessary to protect public health and safety or the environment or to implement the final Remedial Action Plan.

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4.8.5. Discontinuation of Remedial Technology. Any remedial technology employed in implementation of the final Remedial Action Plan shall be left in place and operated by the Responsible Parties except to the extent that the Department authorizes the Responsible Parties in writing to discontinue, move or modify some or all of the remedial technology because the Responsible Parties have met the criteria specified in the final Remedial Action Plan for its discontinuance or because the modifications would better achieve the goals of the final Remedial Action Plan.

4.9. Designated Project Staff. The Responsible Parties shall provide the names and appropriate documentation for the Project Coordinator and Project Engineer/Geologist.

4.9.1. Project Coordinator. Within fifteen (15) days of the effective date of this Order, the Responsible Parties shall submit to the Department in writing the name, address and telephone number of a Project Coordinator. The responsibilities will be to receive all notices, comments, approvals and other communications from the Department to the Responsible Parties.

4.9.2. Project Engineer/Geologist. The work performed pursuant to this Order shall be under the direction and supervision of a qualified professional engineer or a registered geologist, as appropriate, in the State of California with expertise in hazardous waste site cleanup. Within thirty (30) calendar days of the effective date of this Order, the Responsible Parties must submit:

(a) the name and address of the project engineer or geologist chosen by the Responsible Parties; and

(b) in order to demonstrate expertise in hazardous waste cleanup, the resume of the engineer or geologist and the statement of qualifications of the consulting firm responsible for the work.

4.10. Reporting Requirements. The Responsible Parties shall prepare and submit periodic reports as specified below.

4.10.1. Monthly Activity Reports. Within thirty (30) days of the effective date of this Order and monthly thereafter, the Responsible Parties shall submit a Monthly Activity Report summarizing activities under the provisions of this Order. The report shall describe:

(a) Specific actions taken by or on behalf of the Responsible Parties during the previous month;

(b) Actions expected to be undertaken during the next month;

(c) All planned activities for next month;

(d) Any requirements or schedule commitments under this Order that were not completed;

(e) Any problems or anticipated problems in complying with remaining requirements or future schedule commitments under this Order; and

(f) all results of sample analysis, tests and other date generated or received by the Responsible Parties under this Order.

4.10.1.1. The Monthly Activity Report shall be received by the Department no later than ten (10) days after the reporting month ends.

4.10.2. Report submittal. The following reports must be submitted with a signed statement from the Project Engineer/Geologist specified in paragraph 4.9.2. that all work was

carried out under the direction of the Project Engineer/Geologist:

(a) The Remedial Investigation/Feasibility Study Workplan;

(b) The Remedial Investigation Report;

(c) The Feasibility Study Report;

(d) The Drum Removal/Disposal Workplan;

(e) The Drum Removal/Disposal Report;

(f) The Public Participation Plan;

(g) The Remedial Action Plan;

(h) The Remedial Design and Implementation Plan; and

(i) Any Technical Memorandums submitted to document actions completed/agreements reached under this order.

4.10.3. Submittals. All submittals and notifications from the Responsible Parties required by this Order shall be sent simultaneously to:

Mr. Stephen W. Lavinger, Chief
Attention: Walker Properties Project Officer
Department of Toxic Substances Control
Site Mitigation Branch
1405 N. San Fernando Boulevard, Suite 300
Burbank, CA 91504

Mr. Robert P. Ghirelli, Executive Officer
Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, CA 91754

Mr. Anastacio Medina, Chief
Los Angeles County Department of Health Services
Attention: Mr. Tom Klinger
313 North Figueroa Street
Los Angeles, CA 90012

Mr. Andrew C. Lazzaretto, Jr.
City of Santa Fe Springs
Redevelopment Consultant
11710 Telegraph Road
Santa Fe Springs, CA 90670

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Mr. T. A. Tidemanson, Director
Los Angeles County Department of Public Works
UST Local Oversight Program
Annex Building
Post Office Box 1460
Alhambra, California 91802-1460

Mr. Stan Boettcher
Fire Marshall/Battalion Chief
11300 Greenstone Avenue
Santa Fe Springs, California 90670-4619

4.10.4. Communications. All approvals and decisions of the Department made regarding submittals and notifications will be communicated to the Responsible Parties in writing by the Branch Chief, Site Mitigation Branch, Department of Toxic Substances Control or his/her designee. No informal advice, guidance, suggestions or comments by the Department regarding reports, plans, specifications, schedules or any other writings by the Responsible Parties shall be construed to relieve the Responsible Parties of the obligation to obtain such formal approvals as may be required.

4.11. Submittal Review, Modification, and Approval. The following paragraphs describe the Department's procedures for review, modification and approval.

4.11.1. Department Review and Approval. If the Department determines that any report, plan, schedule or other document submitted for approval fails to comply with this Order or fails to protect public health or safety or the environment, the Department may:

(a) modify the document as deemed necessary and approve the document as modified or;

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(b) return the document to the Responsible Parties with recommended changes and a date by which the Responsible Parties must submit to the Department a revised document incorporating the recommended changes; or

(c) in cases where the document fails to comply with this Order, make a determination of non-compliance pursuant to Health and Safety Code Section 25355.5(a)(2).

4.11.2. Incorporation of Plans and Reports. All plans, schedules, reports, specifications and other documents that require Department review and are submitted by the Responsible Parties pursuant to this Order are incorporated in this Order upon approval by the Department and shall be implemented by the Responsible Parties as approved. Any non-compliance with such documents shall be a non-compliance with this Order.

4.12. Quality Assurance/Quality Control. All sampling and analysis conducted by the Responsible Parties under this Order shall be performed in accordance with Quality Assurance/Quality Control procedures submitted by the Responsible Parties and approved by the Department pursuant to this Order.

4.13. Compliance with Applicable Laws. The Responsible Parties shall carry out this Order in compliance with all applicable State and Federal requirements including, but not limited to, requirements to obtain permits and to assure worker safety.

4.14. Endangerment During Implementation. In the event that the Department determines that any circumstances or activities (whether or not pursued in compliance with this Order)

are creating an additional or exacerbating the existing imminent or substantial endangerment to the health or safety of people on the Site or in the surrounding area or to the environment, the Department may order the Responsible Parties to stop further implementation of this Order for such period of time as needed to abate the endangerment. Any deadline in this Order directly affected by a Stop Work Order under this section shall be extended for the term of the Stop Work Order.

4.15. Liability. Nothing in this Order shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current or future operations of the Responsible Parties. Nothing in this Order is intended or shall be construed to limit the rights of any of the parties with respect to claims arising out of or relating to the deposit or disposal at any other location of substances removed from the Site. Nothing in this Order is intended or shall be construed to limit or preclude the Department from taking any action authorized by law to protect public health or safety or the environment and recovering the cost thereof. Notwithstanding compliance with the terms of this Order, the Responsible Parties may be required to take further actions as are necessary to protect public health and the environment.

4.16. Site Access. Access to the Site and laboratories used for analyses of samples under this Order shall be provided at all reasonable times to employees, contractors and consultants of the Department. Nothing in this paragraph is intended or shall be construed to limit in any way the right of entry or inspection

that the Department or any other agency may otherwise have by operation of any law. The Department and its authorized representatives shall have the authority to enter and move freely about all property at the Site at all reasonable times for purposes including, but not limited to: inspecting records, operating logs, sampling and analytic data, and contracts relating to this Site; reviewing the progress of the Responsible Parties in carrying out the terms of this Order; conducting such tests as the Department may deem necessary; and verifying the data submitted to the Department by the Responsible Parties.

4.17. Sampling, Data and Document Availability. The Responsible Parties shall permit the Department and its authorized representatives to inspect and copy all sampling, testing, monitoring or other data generated by the Responsible Parties or on the Responsible Parties' behalf in any way pertaining to work undertaken pursuant to this Order. The Responsible Parties shall notify the Department in writing at least five (5) days in advance of all field sampling under this Order and shall allow the Department and its authorized representatives to take duplicates of any samples collected by the Responsible Parties pursuant to this Order. The Responsible Parties shall maintain in a central depository of the data, reports, and other documents prepared pursuant to this Order. All such data, reports and other documents shall be preserved by the Responsible Parties for a minimum of six (6) years after the conclusion of all activities under this Order. If the Department requests that some or all of these documents be preserved for a longer period of time, the

Responsible Parties shall either comply with that request or deliver the documents to the Department, or permit the Department to copy the documents prior to destruction. The Responsible Parties shall notify the Department in writing at least six (6) months prior to destroying any documents prepared pursuant to this Order.

4.18. Government Liabilities. The State of California shall not be liable for any injuries or damages to persons or property resulting from acts or omissions by the Responsible Parties, or related parties specified in paragraph 4.26 in carrying out activities pursuant to this Order, nor shall the State of California be held as a party to any contract entered into by the Responsible Parties or its agents in carrying out the activities pursuant to this Order.

4.19. Additional Enforcement Actions. By issuance of this Order, the Department does not waive the right to take any further enforcement actions.

4.20. Incorporation of Plans and Reports. All plans, schedules, reports, specifications and other documents that require Department review and are submitted by the Responsible Parties pursuant to this Order are incorporated in this Order upon approval by the Department and shall be implemented by the Responsible Parties as approved. Any non-compliance with such documents shall be a non-compliance with this Order.

4.21. Extension Requests. If the Responsible Parties are unable to perform any activity or submit any document within the time required under this Order, the Responsible Parties may, prior

to expiration of the time, request an extension of the time in writing. The extension request shall include a justification for the delay. All such requests shall be in advance of the date on which the activity or document is due.

4.22. Extension Approvals. If the Department determines that good cause exists for an extension it will grant the request and specify in writing a new schedule. The Responsible Parties shall comply with the new schedule. Any non-compliance with the new schedule shall be a non-compliance with this Order.

4.23. Cost Recovery. The Responsible Parties are liable for any costs of oversight by the Department of activities undertaken by the Responsible Parties under this Order. In addition, failure or refusal of the Responsible Parties to comply with this Order shall make the Responsible Parties liable for any governmental costs which may be incurred, including those payable from the Hazardous Substance Account or the Hazardous Substance Cleanup Fund for any response action at the Site, as provided in Section 25360 of the Health and Safety Code and other applicable provisions of law. These costs include the Department's direct costs, indirect cost, and administrative overhead costs. Cost recovery may also be pursued by the Department under the Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C. 9601 et seq.).

4.24. Modifications. The Department reserves the right to unilaterally modify this Order. Any modification to this Order shall be effective upon issuance and deemed incorporated in this Order.

4.25. Time Periods. Unless otherwise specified, time periods begin from the effective date of this Order and "days" means calendar days. The effective date of this Order is the date of issuance by the Department.

4.26. Parties Bound. This Order applies to and is binding upon the Responsible Parties, and their officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors and assignees, including but not limited to, individuals, partners, and subsidiary and parent corporations and upon any successor agency of the State of California that may have responsibility for and jurisdiction over the subject matter of this Order.

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5.0 GENERAL PROVISIONS

5.1 Regulatory Obligations. Nothing in this Order is intended, nor shall it be construed, to relieve any of the Responsible Parties of any obligations under state or federal law or under other administrative orders. By issuing this Order the Department does not waive the right to take further actions against the Responsible Parties.

5.2 Response Costs and Penalties. The Department reserves all rights to recover past response costs incurred by the Department as a result of the release, or threatened release, of hazardous substances at the Site; and reserves all rights to recover penalties or treble damages for any past failure or refusal by the Responsible Parties to comply with Orders issued by the Department as a result of a release, or threatened release, of hazardous substances at the Site.

5.3. Exhibits. All Exhibits attached to this Order are incorporated herein by this reference.

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6.0 PENALTIES AND PUNITIVE DAMAGES FOR NON-COMPLIANCE

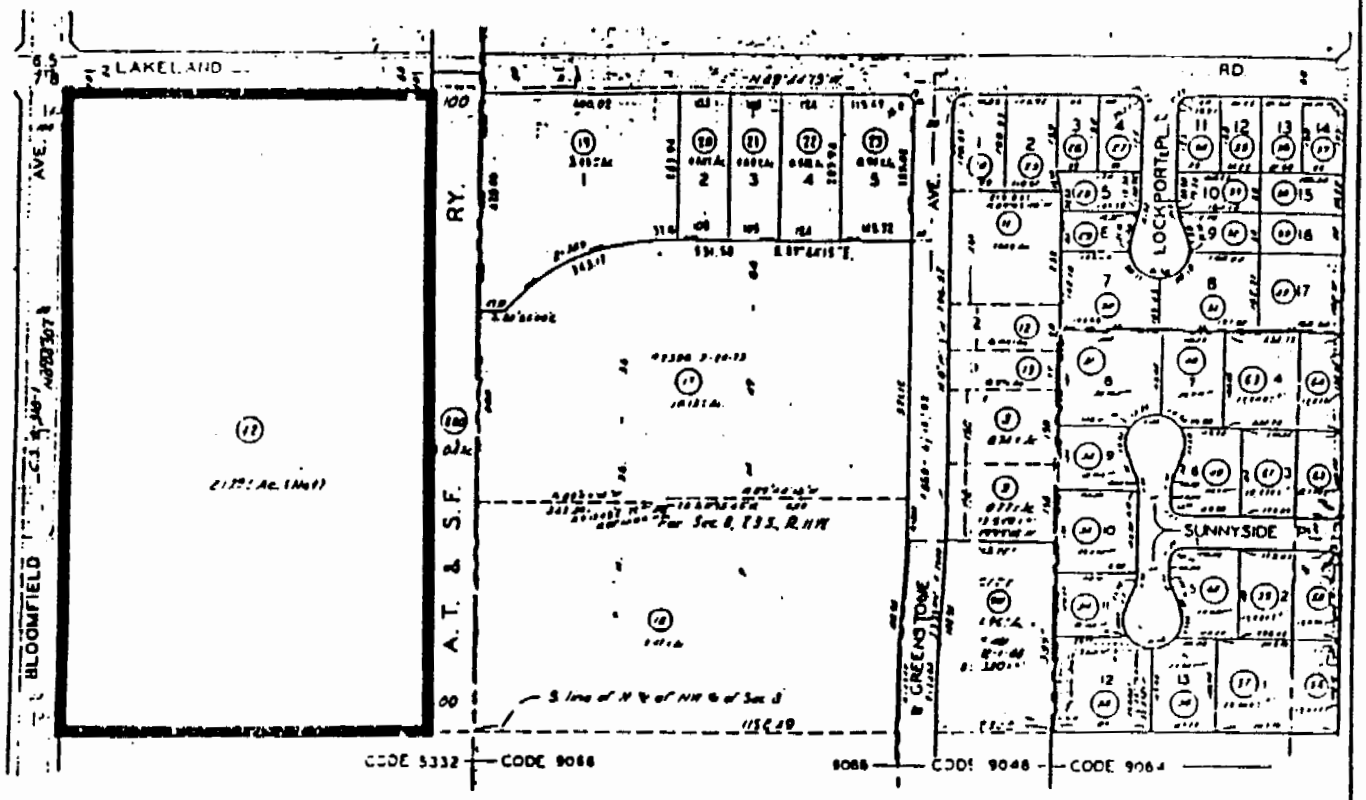
6.1. Penalties for Non-compliance. The Responsible Parties may be liable for penalties of up to twenty-five thousand dollars ($25,000.00) for each day of refusal to comply with this Order and for punitive damages up to three (3) times the amount of any costs incurred by the Department as a result of your failure to comply, pursuant to Health and Safety Code Section 25359 and 25367(c).

Dated: October 26, 1992

Stephen W. Lavinger, Chief
Site Mitigation Branch
Department Of Toxic Substances Control

EXHIBIT 1

FIRST AMENDED IMMINENT OR SUBSTANTIAL ENDANGERMENT AND REMEDIAL ACTION ORDER
DOCKET NUMBER HSA I&/SE 91/92-009
OCTOBER 26, 1992



EXPLANATION

(40) Parcel Number

Subject Property

Adapted From:
County of Los Angeles Assessor's
Book 8(26, Page 1

0 700
Approximate Scale (Feet)

ASSESSOR'S PARCEL MAP

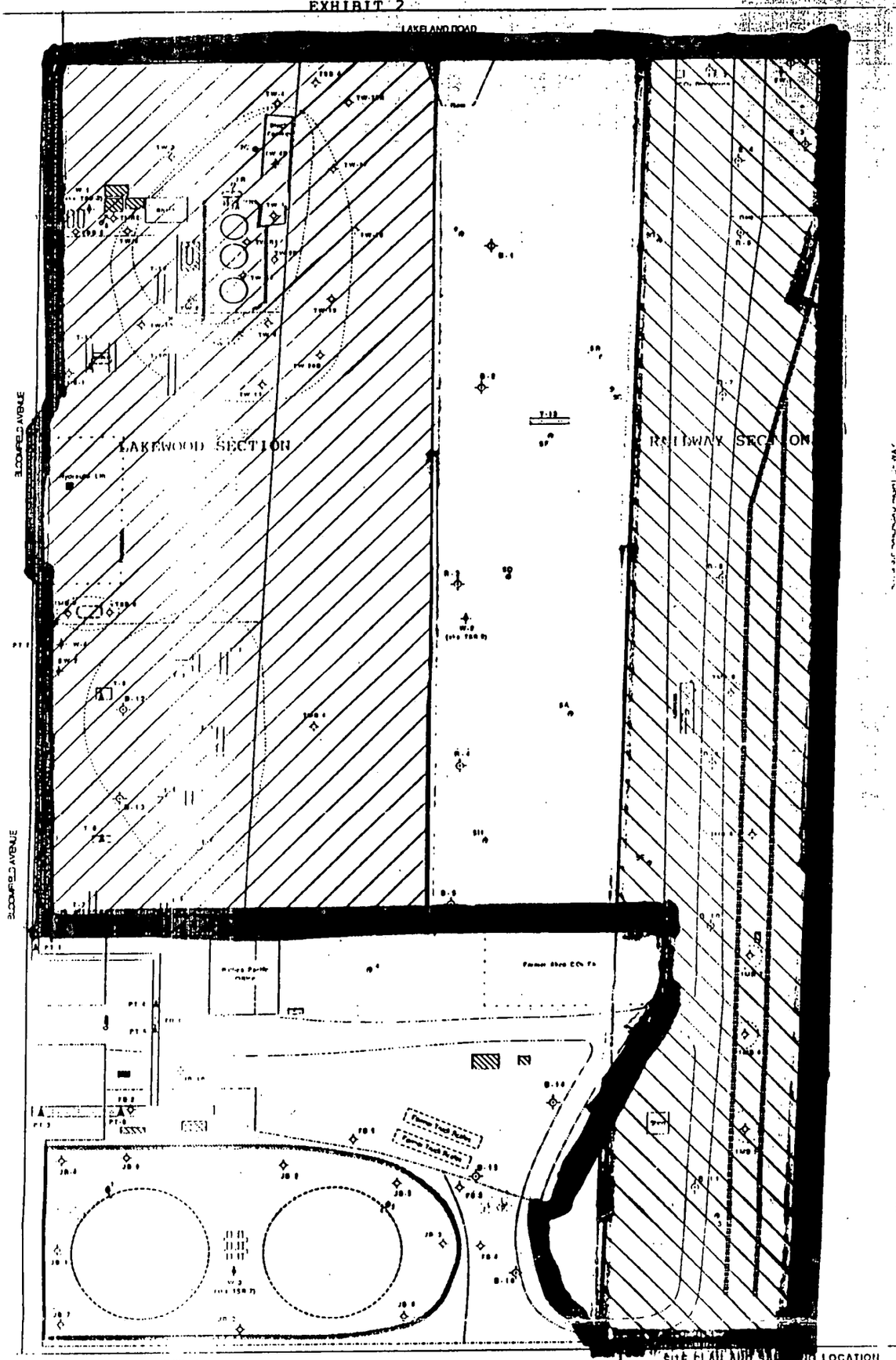
WALKER PROPERTIES
SANTA FE SPRINGS, CALIFORNIA

FIGURE 1-3

TRC

FIRST AMENDED IMMINENT OR SUBSTANTIAL ENDANGERMENT AND REMEDIAL ACTION ORDER
DOCKET NUMBER HSA I&/SE 91/91-009
OCTOBER 26,1992

EXHIBIT 2



FENCE LINE OF REPAIRED/REPLACED FENCE CONSTRUCTED BY THE DEPARTMENT

EXHIBIT 3

SCHEDULE FOR THE WALKER PROPERTIES SITE

	Milestone/Activity to be Completed	Number of Days	Calendar Date
1)	Fence and Post Lakewood and Railroad Section	Completed by the Department during period of Non-compliance	
2)	Begin Weed Control and Abatement Activities	15 days	November 10, 1992
3)	Submittal of Name of Project Coordinator	15 days	November 10, 1992
4)	Submittal of Name of Project Engineer	30 days	November 25, 1992
5)	Submittal of First Monthly Activity Report	30 days	November 25, 1992
6)	Submittal of Certification of Weed Abatement and Control	45 days	December 10, 1992
7)	Submittal of List of Interviewees and Interview Questions	60 days	December 25, 1992
8)	Drum Removal Workplan Submittal	60 days	December 25, 1992
8a)	The Department will review the Drum Removal Workplan and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
8b)	Certification of Completion of Drum Removal	60 days after approval of Drum Removal Plan by the Department.	
9)	Submittal of First Draft of Remedial Investigation/ Feasibility Study Fact Sheet	120 days	February 23, 1992

	Milestone/Activity to be Completed	Number of Days	Calendar Date
9a)	The Department will review the Remedial Investigation/ Feasibility Fact Sheet and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
10)	Draft Remedial Investigation/ Feasibility Study Workplan Submittal	120 days	February 23, 1992
10a)	The Department will review the Remedial Investigation/Feasibility Study Workplan and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
11)	Draft Public Participation Plan Submittal	120 days	February 23, 1992
11a)	The Department will review the Public Participation Plan and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
12)	Draft Remedial Investigation Report	150 days after approval of workplan by the Department.	
12a)	The Department will review the Remedial Investigation Report and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
13)	Draft Feasibility Study Submittal	60 days after submittal of Draft Remedial Investigation Report.	

Milestone/Activity to be Completed	Number of Days	Calendar Date
13a) The Department will review the Feasibility Study Report and specify required revisions in accordance with paragraph 4.11.1 of the Order.		
14) Completion Of Remedial Investigation/Feasibility Study		December 1993
15) Draft Remedial Action Plan	60 days after Department approval of the Remedial Investigation/ Feasibility Study	
15a) The Department will review the Draft Remedial Action Plan and specify required revisions in accordance with paragraph 4.11.1 of the Order. The Draft Remedial Action Plan shall be circulated for public comment in accordance with paragraph 4.7 of the Order.		
15b) Completion of all activities associated with preparing and finalizing Remedial Action Plan		April 1994
15) Completion of all Removal or Remedial Actions	June 1995 Schedule to be contained in final Remedial Action Plan	